

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and DOES NOS.  
1-50,

Defendants.

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**DECLARATION OF RENA ANDOH**

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,  
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Opposition to defendants Misook Kim and Robert Alin Pilkington’s Motion to Dismiss for Lack of Personal Jurisdiction or Venue or, in the Alternative, For a Change of Venue.

2. Attached as **Exhibit “A”** is a true and correct copy of Moog’s April 7, 2022 letter submission (and enclosed exhibits) to Magistrate Judge McCarthy, sent via e-mail at 8:01 a.m. EST on April 7, 2022.

3. In addition to the events described and included in **Exhibit “A”** above, a relevant timeline of events showing the amount of litigation activity by all parties, including Pilkington and Kim, is as follows:

- 3/11/22 – following days of negotiations (including telephonic and e-mail correspondence), the parties file a stipulation and order regarding the relief sought in Moog’s Motion for Temporary Restraining Order (ECF 25);
- 3/17/22 – following days of negotiation (including telephonic and e-mail meet and confer correspondence), the parties file a stipulation and order regarding expedited discovery (ECF 33);
- 3/17/22 – Kim and Pilkington request the production of their employment and personnel records (produced by Moog on April 5, 2022);
- 3/23/22 – all defendants, including Kim and Pilkington, serve written discovery requests;
- 3/28/22 – all parties engage in a conference call with iDiscovery Solutions to start the retention process of a neutral forensics firm;
- 3/29/22 – Kim and Pilkington file a motions to dismiss (ECF 47);
- 4/1/22 – engagement letter of iDiscovery Solutions is signed by all parties;
- 4/1/22 – Kim and Pilkington turn over a total of 23 electronic devices to iDiscovery Solutions; and
- 4/7/22 and 4/8/22 – all parties engage in two meet and confer conference calls regarding the issues set forth in Moog’s April 7 letter submission to Magistrate Judge McCarthy.

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: April 12, 2022



Rena Andoh